

December 17, 2024

Via Electronic Filing

Scott S. Harris
Clerk of Court
Supreme Court of the United States
One First Street, NE
Washington, DC 20543

Re: No. 24-630, *Union Pacific Railroad Company v. Nicholas DeFries, James Blankinship, Justin Donahue, et al.*

Dear Mr. Harris:

I write to enter my appearance as counsel of record for the respondents and to request a thirty-day extension of the time to file a response to the petition for certiorari in this case. The response is currently due on January 8, 2025, and I respectfully request that the deadline be extended to, and include, February 7, 2025.

There is good cause for this request. My colleagues and I are heavily engaged with other appellate matters that would make it impossible to prepare a brief absent an extension, including two oral arguments in this Court. These deadlines include a reply brief in the Ninth Circuit in *Healy v. Milliman*, No. 24-3327, on January 6, 2025; an opening brief in the First Circuit in *State Teachers Retirement Systems of Ohio v. Charles River Labs International*, No. 24-1705, on January 6, 2025; a reply brief in support of a petition for certiorari in this Court in *Louis v. Bluegreen*, No. 24-453, on January 7, 2025; a reply brief in the Fourth Circuit in *Grice v. Independent Bank*, No. 24-1395, on January 8, 2025; an oral argument in this Court in *Stanley v. City of Sanford*, No. 23-997, on January 13, 2025; an oral argument in the Court in *McLaughlin Chiropractic Associates, Inc. v. McKesson Corporation*, No. 23-1226, on January 21, 2025; a reply brief due in the Ninth Circuit in *King v. Navy Federal Credit Union*, No. 24-1838, on January 27, 2025; and a reply brief in the Sixth Circuit in *Gardner v. Flagstar Bank*, No. 24-1426, on January 31, 2025.

For these reasons, my colleagues and I will require additional time to prepare an adequate response to the petition. A thirty-day extension will allow us to balance these other responsibilities with our obligations in this case.

Thank you for your attention to this matter.

Sincerely,

/s/ Matthew W.H. Wessler
Matthew W.H. Wessler

cc: Counsel of Record